

**IN THE UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF DELAWARE**

GUARDIAN INDUSTRIES CORPORATION,

Plaintiff,

v.

DELL INC.; GATEWAY, INC.;
HEWLETT-PACKARD COMPANY; ACER INC.;
ACER AMERICA CORPORATION;
AOC INTERNATIONAL;
ENVISION PERIPHERALS, INC.;
TPV TECHNOLOGY, LTD.;
TPV INTERNATIONAL (USA) INC.;
AU OPTRONICS CORPORATION;
AU OPTRONICS CORPORATION AMERICA a/k/a
AU OPTRONICS AMERICA, INC.;
BENQ CORPORATION;
BENQ AMERICA CORPORATION;
CHUNGHWA PICTURE TUBES, LTD. a/k/a
CHUNGHWA PICTURE TUBES COMPANY.;
TATUNG COMPANY;
TATUNG COMPANY OF AMERICA, INC.;
BOE HYDIS TECHNOLOGY COMPANY, LTD.;
BOE HYDIS AMERICA, INC.;
CHI MEI OPTOELECTRONICS;
COMPAL ELECTRONICS, INC.;
DELTA ELECTRONICS, INC.;
DELTA PRODUCTS CORPORATION;
DELTA ELECTRONICS (THAILAND)
PUBLIC COMPANY, LTD.;
HANNSTAR DISPLAY CORPORATION;
JEAN CO., LTD.;
LITE-ON TECHNOLOGY CORPORATION;
LITE-ON, INC. a/k/a
LITEON TRADING USA, INC.;
MAG TECHNOLOGY COMPANY, LTD.;
MAG TECHNOLOGY USA, INC.;
PROVIEW INTERNATIONAL HOLDINGS, LTD.;
PROVIEW TECHNOLOGY, INC.;
PROVIEW ELECTRONICS COMPANY, LTD; and
QUANTA DISPLAY, INC.

Defendants.

C.A. No. 05-27-SLR

JURY TRIAL DEMANDED

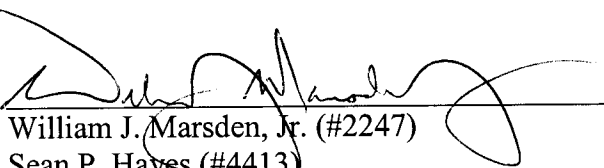
**HEWLETT-PACKARD COMPANY'S MOTION TO STAY PENDING RESOLUTION
OF THE CASE AGAINST LCD MODULE MANUFACTURERS**

Defendant Hewlett-Packard Company ("HP"), as a customer of allegedly infringing liquid crystal display ("LCD") products, respectfully moves this Court to enter an Order staying the above-captioned action against HP pending the final resolution of Plaintiff Guardian Industries Corporation's ("Guardian") claims against the LCD product manufacturers in this action. As a customer of allegedly infringing products, HP has no technical information regarding the design and/or manufacture of such products, nor does HP have the ability to address fully and thoroughly the substance of the claims raised by Guardian. The LCD product manufacturers who sell the allegedly infringing LCD modules to HP and other defendants should have an strong interest in defending their products and they have the technical and factual information necessary to defend against Guardian's claims of patent infringement. Furthermore, based upon HP's preliminary investigation, it is clear that many of HP's suppliers of allegedly infringing LCD products are either co-defendants in this action or have obtained licenses from Guardian.

The grounds for this Motion are fully set forth in the accompanying Hewlett-Packard Company's Memorandum in Support of Its Motion to Stay Pending Resolution of the Cases Against LCD Module Manufacturers and in the briefs filed in support of the motions to stay filed by Dell, Gateway, and Tatung. (D.I. 110, 112, 115). A Proposed Order granting Hewlett-Packard Company's Motion is attached hereto as Exhibit A.

Dated: June 17, 2005

FISH & RICHARDSON P.C.

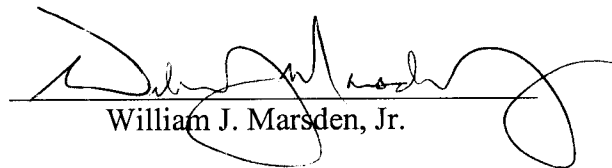
By: 
William J. Marsden, Jr. (#2247)
Sean P. Hayes (#4413)
919 N. Market Street, Suite 1100
P.O. Box 1114
Wilmington, DE 19899-1114
(302) 652-5070

Michael J. McKeon
1425 K Street, N.W., 11th Floor
Washington, DC 20005-2500
(202) 783-5070

*Attorneys for Defendant
Hewlett-Packard Company*

**CERTIFICATION PURSUANT TO
DISTRICT OF DELAWARE LOCAL RULE 7.1.1**

Counsel for Defendant Hewlett-Packard Company have consulted with counsel for Plaintiff Guardian Industries Corporation pursuant to District of Delaware Local Rule 7.1.1 and have been advised that Plaintiff will not consent to the relief sought by the Motion.



William J. Marsden, Jr.

CERTIFICATE OF SERVICE

I hereby certify that on June 17, 2005, I electronically filed with the Clerk of Court using CM/ECF Hewlett-Packard Company's Motion To Stay Pending Resolution Of The Case Against LCD Module Manufacturers which will send notification of such filing(s) to the following:

Richard L. Horwitz, Esq.
David E. Moore, Esq.
Potter Anderson & Corroon LLP
1313 N. Market Street, 6th Floor
Wilmington, DE 19801

Gerard M. O'Rourke
Connolly Bove Lodge & Hutz LLP
1007 North Orange Street
Wilmington, DE 19801

Robert W. Whetzel, Esq.
Richards Layton & Finger
One Rodney Square
Wilmington, DE 19801

Josy Ingersoll, Esq.
Young Conaway Stargatt & Taylor LLP
The Brandywine Building
1000 West Street, 17th
Wilmington, DE 19801

Richard K. Herrmann, Esq.
Morris James Hitchens & Williams
222 Delaware Avenue, 10th Floor
Wilmington, DE 19801

Steven Balick, Esq.
Ashby & Geddes
222 Delaware Avenue, 17th Floor
Wilmington, DE 19899

Jeffrey S. Goddess
Rosenthal, Monhait, Gross & Goddess
Mellon Bank Center, Suite 1401
Wilmington, DE 19801

I hereby certify that on June 17, 2005, the foregoing document was e-mailed to the following non-registered participants:

Teresa M. Corbin, Esq.
Daniel T. Shvodian
David L. Bilsker
Wallace Wu
Howrey LLP
525 Market Street, Suite 2600
San Francisco, CA 94105
corbint@howrey.com

York M. Faulkner, Esq.
Finnegan Henderson Farabow Garrett &
Dunner
Two Freedom Square
11955 Freedom Drive
Reston, VA 20190-5675
York.faulkner@finnegan.com

Roderick B. Williams, Esq.
Avelyn M. Ross, Esq.
Vinson & Elkins
2801 Via Fortuna, Suite 100
Austin, TX 78746-6568
rickwilliams@velaw.com
aross@velaw.com

Robert J. Gunther, Jr., Esq.
Kurt M. Rogers
Latham & Watkins
885 Third Avenue
New York, NY 10022
Robert.gunther@lw.com
Kurt.rogers@lw.com

E. Robert Yoches, Esq.
Finnegan Henderson Farabow Garrett
& Dunner
901 New York Avenue, N.W.
Washington, D.C. 20001
Bob.yoches@finnegan.com

Bryan S. Hales
Meredith Zinanni
Kirkland & Ellis LLP
200 East Randolph Drive
Chicago, IL 60601
bhales@kirkland.com
mzinanni@kirkland.com

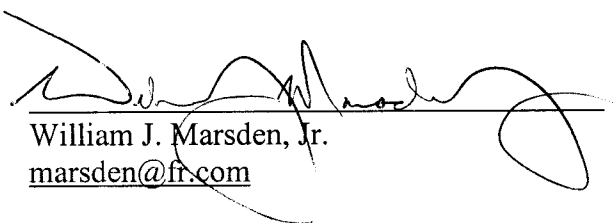
Kevin M. O'Brien
John G. Flaim
Jennifer A. Semko
Baker & McKenzie LLP
815 Connecticut Avenue, N.W.
Washington D.C. 20006
kevin.m.o'brien@bakernet.com
jennifer.a.semko@bakernet.com

Peter J. Weild, Esq.
Alschuler Grossman Stein & Kahan LLP
1620 26th Street, 4th Floor, N Tower
Santa Monica, CA 90404-4060
pwied@agsk.com

Robert C. Weems, Esq.
Baum & Weems
58 Katrina Lane
San Anselmo, CA 94960
reweems@comcast.net

Jeffrey A. Snyder, Esq.
Thoits, Love, Hershberger & McLean
245 Lytton Avenue, Suite 300
Palo Alto, CA 94301
jsnyder@thoits.com

Eric L. Wesenberg
Orrick, Herrington & Sutcliffe LLP
1000 Marsh Road
Menlo Park, CA 94025
ewesenberg@orrick.com
ktseng@orrick.com
ryoung@orrick.com



William J. Marsden, Jr.
marsden@fr.com